

Remarks

The Office Action dated September 2, 2010 has been received and carefully reviewed. The preceding amendments and the following remarks form a full and complete response thereto. Claims 1, 9, 39 and 48 are independent. Claims 6-8, 13-38, 40-47, 49-58, 60-61, and 64-75 have been previously cancelled. Claim 76 is cancelled without prejudice or disclaimer. Claims 1-5, 9-12, 39, 48, and 63 are amended. No new matter is being added or issues raised that require further consideration or search. Support for the amendments can be found in the specification at, inter alia, paragraph [0016]. Accordingly, claims 1-5, 9-12, 39, 48, 59, and 62-63 are pending in the application and are submitted for reconsideration.

Claim Objections

Claim 1

The Office Action has objected to claim 1 and alleged that the limitation “the specific viewing conditions,” found in line 9 of claim 1, does not have proper antecedent basis and is unclear as to which viewing conditions are being claimed. Additionally, the Office Action notes that claims 2-5, 59 and 76, which depend from claim 1, allegedly inherit the alleged deficiency of claim 1. Applicants respectfully disagree with the Office Action’s objection.

Antecedent basis for the limitation “the specific viewing conditions,” found in line 9 of claim 1, can be found in lines 2-3 of claim 1, which state: “diffraction structure embossed during an embossing process with an embossing die, which under specific viewing conditions reconstructs a diffractive image, wherein the area has subareas being.” (emphasis added.) Additionally, this portion clearly sets forth that the “specific viewing conditions” are the viewing conditions under which a diffractive image is reconstructed. Thus, Applicants submit that the limitation “the specific viewing conditions,” found in line 9 of claim 1, is supported by proper antecedent basis and is clear in meaning. Additionally, Applicants submit that claims 2-5, 59, and 76 are likewise proper.

However, in an effort to advance prosecution in this application, Applicants have amended the limitation to recite: “the specific viewing conditions, under which the diffraction structure reconstructs the diffractive image.” Applicants assert that this amendment in no way

substantively changes the scope of claim 1, but rather is a mere formality to better assist the Office in its examination of the pending claims. Thus, Applicant's assert that this amendment should be entered. Applicants respectfully request that the current objection be withdrawn.

Claim 3

The Office Action has objected to claim 3 and alleged that the limitation "the first reflection layer" does not have proper antecedent basis. Applicants have amended claim 3 to recite: "a first reflection layer." This limitation is now properly presented in claim 3.

Applicants assert that this amendment in no way substantively changes the scope of claim 3, but rather is a mere formality to better assist the Office in its examination of the pending claims. Thus, Applicants assert that this amendment should be entered. Applicants respectfully request that the current objection be withdrawn.

Claim 4

The Office Action has objected to claim 4 and alleged that the limitation "the first reflection layer" does not have proper antecedent basis. Additionally, the Office Action notes that claims 5 and 59, which depend from claim 4, allegedly inherit the alleged deficiency of claim 4. Applicants have amended claim 4 to recite: "a first reflection layer." This limitation is now properly presented in claim 4. Additionally, Applicants submit that claims 5 and 59 are likewise proper.

Applicants assert that this amendment in no way substantively changes the scope of claim 4, but rather is a mere formality to better assist the Office in its examination of the pending claims. Thus, Applicants assert that this amendment should be entered. Applicants respectfully request that the current objection be withdrawn.

Claim 9

The Office Action has objected to claim 9 and alleged that the limitation "the specific viewing conditions of the diffractive image," found in line 7 of claim 9, does not have proper antecedent basis. Additionally, the Office Action notes that claims 10-12 and 62-63, which depend from claim 9, allegedly inherit the alleged deficiency of claim 9. Applicants respectfully

disagree with the Office Action's objection.

Antecedent basis for the limitation "the specific viewing conditions of the diffractive image," found in line 7 of claim 9, can be found in lines 2-3 of claim 9, which state: "diffraction structure embossed during an embossing process with an embossing die, which under specific viewing conditions reconstructs a diffractive image, wherein the area has subareas being." (emphasis added.) Thus, Applicants submit that the limitation "the specific viewing conditions of the diffractive image," found in line 7 of claim 9, is supported by proper antecedent basis. Additionally, Applicants submit that claims 10-12 and 62-63 are likewise proper.

However, in an effort to advance prosecution in this application, Applicants have amended the limitation to recite: "the specific viewing conditions, under which the diffraction structure reconstructs the diffractive image." Applicants assert that this amendment in no way substantively changes the scope of claim 9, but rather is a mere formality to better assist the Office in its examination of the pending claims. Thus, Applicants assert that this amendment should be entered. Applicants respectfully request that the current objection be withdrawn.

Claim 10

The Office Action has objected to claim 10 and alleged that the limitation "the first reflection layer" does not have proper antecedent basis. Additionally, the Office Action notes that claims 11 and 62-63, which depend from claim 10, allegedly inherit the alleged deficiency of claim 10. Applicants have amended claim 10 to recite: "a first reflection layer." This limitation is now properly presented in claim 10. Additionally, Applicants submit that claims 11 and 62-63 are likewise proper.

Applicants assert that this amendment in no way substantively changes the scope of claim 10, but rather is a mere formality to better assist the Office in its examination of the pending claims. Thus, Applicants assert that this amendment should be entered. Applicants respectfully request that the current objection be withdrawn.

Claim 39

The Office Action has objected to claim 39 and alleged that the limitation "the specific viewing conditions of the diffractive image," found in line 10 of claim 39, does not have proper

antecedent basis. Applicants respectfully disagree with the Office Action's objection.

Antecedent basis for the limitation "the specific viewing conditions of the diffractive image," found in line 10 of claim 39, can be found in lines 3-4 of claim 39, which state: "with a diffraction structure, which under specific viewing conditions reconstructs a diffractive image," (emphasis added.) Thus, Applicants submit that the limitation "the specific viewing conditions of the diffractive image," found in line 10 of claim 39, is supported by proper antecedent basis.

However, in an effort to advance prosecution in this application, Applicants have amended the limitation to recite: "the specific viewing conditions, under which the diffraction structure reconstructs the diffractive image." Applicants assert that this amendment in no way substantively changes the scope of claim 39, but rather is a mere formality to better assist the Office in its examination of the pending claims. Thus, Applicants assert that this amendment should be entered. Applicants respectfully request that the current objection be withdrawn.

Claim 48

The Office Action has objected to claim 48 and alleged that the limitation "the specific viewing conditions of the diffractive image," found in line 9 of claim 48, does not have proper antecedent basis. Applicants respectfully disagree with the Office Action's objection.

Antecedent basis for the limitation "the specific viewing conditions of the diffractive image," found in line 9 of claim 48, can be found in lines 3-4 of claim 48, which state: "with a diffraction structure, which under specific viewing conditions reconstructs a diffractive image," (emphasis added.) Thus, Applicants submit that the limitation "the specific viewing conditions of the diffractive image," found in line 9 of claim 48, is supported by proper antecedent basis.

However, in an effort to advance prosecution in this application, Applicants have amended the limitation to recite: "the specific viewing conditions, under which the diffraction structure reconstructs the diffractive image." Applicants assert that this amendment in no way substantively changes the scope of claim 48, but rather is a mere formality to better assist the Office in its examination of the pending claims. Thus, Applicants assert that this amendment should be entered. Applicants respectfully request that the current objection be withdrawn.

Claim 76

By this Amendment claim 76 has been cancelled.

Claim Rejections – 35 U.S.C. § 103

The Office Action has rejected claims 1-2, 9, 12, 39, 48, and 76 under 35 U.S.C. § 103 as allegedly unpatentable over U.S. Patent No. 6,491,324 to Schmitz et al. (“Schmitz”) in view of U.S. Patent No. 6,876,472 to Menz et al. (“Menz”). Applicants respectfully disagree and traverse this rejection.

Claim 1 defines a security element. The security element has at least one area with a diffraction structure embossed during an embossing process with an embossing die. Under specific viewing conditions, the diffraction structure reconstructs a diffractive image. The at least one area also has subareas that are free of any diffraction structures. The subareas do not take part in the reconstruction of the diffractive image. The subareas represent recognizable information. According to claim 1, the subareas and the diffraction structure surrounding the subareas have the same, or at least very similar, reflecting properties under particular viewing conditions. Under these viewing conditions the diffraction structure does not represent a diffractive image. Thus, the recognizable information represented by the subareas is recognizable substantially only under the specific viewing conditions, under which the diffraction structure reconstructs the diffractive image. Further, claim 1 provides that at least one of the subareas is produced during the embossing process with the embossing die already providing the at least one of the subareas being free of any diffraction structures.

Claim 9 defines a security element. The security element has at least one area with a diffraction structure embossed during an embossing process with an embossing die. Under specific viewing conditions, the diffraction structure reconstructs a diffractive image. The at least one area also has subareas being free of any diffraction structures. The subareas do not take part in the reconstruction of the diffractive image. The subareas represent recognizable information. The subareas form a non-diffractive contrast image, so that the recognizable information represented by the subareas is recognizable under viewing conditions differing from the specific viewing conditions, under which the diffraction structure reconstructs the diffractive image. Further, claim 9 provides that at least one of the subareas is produced during the

embossing process with the embossing die already providing the at least one of the subareas being free of any diffraction structures.

Claim 39 defines a method for producing a security element. The method includes the step of embossing during an embossing process with an embossing die at least one area with a diffraction structure, which under specific viewing conditions reconstructs a diffractive image. The method further includes the step of producing subareas in the area that do not take part in the reconstruction of the diffractive image. These subareas represent recognizable information and are integrated in the area with the diffraction structure. The subareas and the diffraction structure surrounding the subareas have the same or at least very similar reflecting properties in viewing conditions under which the diffraction structure does not represent a diffractive image, so that the recognizable information represented by the subareas is recognizable mainly only under the specific viewing conditions, under which the diffraction structure reconstructs the diffractive image. Further, claim 39 provides that at least one of the subareas is produced during the embossing process with the embossing die already providing the at least one the subareas being free of any diffraction structures.

Claim 48 defines a method for producing a security element. The method includes the step of embossing, during an embossing process with an embossing die, at least one area with a diffraction structure that under specific viewing conditions reconstructs a diffractive image. The method further includes the step of producing subareas in the area which do not take part in the reconstruction of the diffractive image. These subareas represent recognizable information, and are integrated in the area with the diffraction structure. The subareas form a non-diffractive contrast image, so that the recognizable information represented by the subareas is recognizable under viewing conditions differing from the specific viewing conditions, under which the diffraction structure reconstructs the diffractive image. Further, claim 48 provides that at least one of the subareas is produced during the embossing process with the embossing die already providing the at least one of the subareas being free of any diffraction structures.

Schmitz is generally directed to a security document having a magnetic layer and a semitransparent layer covering the magnetic layer. See Schmitz Abstract; col. 1, lns. 6-10; col. 2, lns. 8-10. The magnetic layer serves as a security element and is normally visible as a dark stripe. See Schmitz col. 1, lns. 16-20. More particularly, Schmitz aims to provide a security

document that has a magnetic layer that is barely visible in reflected light. See Schmitz Abstract; col. 5, lns. 26-28. In order to achieve this, the security document is provided with a semitransparent layer that is disposed over the magnetic layer. Id. The magnetic layer can contain gaps in the form of visually and/or machine recognizable characters. See Schmitz col. 2, lns. 48-50. The gaps (and any information encoded therein) are visible only when viewed using transmitted light. See Schmitz col. 5, lns. 22-24; col. 5, lns. 25-27, 62-65; col. 7, lns. 22-25. Transmitted light, as used in Schmitz, means light that is transmitted from the side of the carrier that does not support the magnetic layer, through the carrier, and through any gaps in the magnetic layer. See Schmitz col. 6, lns. 1-9. While the magnetic layer 5 blocks a portion of the transmitted light, the transmitted light that passes through the gaps 10 is visible, and thus can reveal information represented in the gaps 10. According to Schmitz, a diffraction structure, which may be an embossed structure, is disposed over the magnetic layer. See Schmitz Figs. 7 and 8 (ref. # 13), col. 6, lns. 60 to 63; col. 8, lns. 13-16. Schmitz discloses that a lacquer layer 13, on which a diffraction structure may be formed, is applied over, inter alia, the magnetic layer 5, and that the magnetic layer 5 has gaps 10. See Schmitz Fig. 8 and col. 6, lns. 51-65. Additionally, Schmitz discloses that the diffraction structure 13 can be formed on the opposite side of a carrier 4 from the magnetic layer 5. See Schmitz Fig. 7 and col. 6, lns. 10-30. Additionally, Schmitz discloses that the optically variable effects (i.e., diffractive images) are visible only in reflected light. See Schmitz col. 5, lns. 26-27; col. 6, lns. 25-27, 62-65; col. 7, lns. 22-25. Thus, according to Schmitz, the diffractive image is visible in reflected light and the gaps (and any information encoded therein) are not visible in reflected light. In each of the embodiments described in Schmitz the diffraction structure is formed on a different layer in a different plane than the magnetic layer.

Menz is generally directed to an optical feature, in particular for documents of value, and a manufacturing method for the later individualization or data storage. See Menz Abstract. According to Menz, a hologram, having two or more channels, is constructed on a document of value. Id. This hologram allows for the holographic reconstruction of different images from different directions of gaze. See Menz col. 2, lns. 30-33. For example, a two-channel hologram allows from the reconstruction of two different images when the hologram is viewed from two different gazes. Id. The region of the hologram has sub-regions that do not take part in the

holographic image reconstruction. See Menz col. 2, lns. 46-47. These sub-regions can be patterned to convey an identification number, registration number, or a corresponding image. . See Menz col. 3, lns. 1-13. The creation of the sub-regions is accomplished by destroying portions of the hologram using a laser or by printing over portions of the hologram so that these portions no longer take part in the reconstruction of the holographic image. See Menz col. 3, lns. 14-26. Thus, the methods taught in Menz require the construction of a hologram on a document of value, and the subsequent destruction of a portion of the hologram. See Menz Title (i.e., “[o]ptical feature, in particular for documents of value, and a manufacturing method for the later individualization or data storage” (emphasis added)).

Claim 1

With regard to claim 1, the Office Action admits that Schmitz fails to teach or suggest that “the viewing conditions under which the diffraction structure does not represent a diffractive image, are when the subareas and the diffraction structures surrounding the subareas have the same or at least very similar reflection properties,” See Office Action at page 6. This statement corresponds to the claim limitation: “the subareas and the diffraction structure surrounding the subareas have the same or at least very similar reflecting properties under viewing conditions, under which the diffraction structure does not represent a diffractive image,” as recited in claim 1. The Office Action submits that this limitation is disclosed in Menz, as described in detail above.

The Office Action asserts that the “on-axis/off-axis design” (i.e., different images based on different gazes), disclosed in Menz, can be combined with the security element, disclosed in Schmitz, to arrive at a “diffraction structure [that] reconstructs a diffractive image under on-axis transmitted/reflected light, and that the viewing conditions under which the diffraction structure does not represent a diffractive image can be under off-axis transmitted/reflected light.” See Office Action at page 6. Put simply, the Office Action submits that the “on-axis/off-axis” design of Menz could be incorporated into the security element of Schmitz, such that the diffractive image, as taught or suggested in Schmitz, is only reconstructed under the “on-axis” viewing angles. The Office Action’s combination is the result of hindsight reasoning.

The suggested combination of Schmitz and Menz would render the security element of

Schmitz unsatisfactory for its intended purpose and impermissibly change its function. See MPEP §§ 2143.01 (“If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious.”); See 2143.02 (“[i]f proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification.”).

As described above, the security element of Schmitz is designed in such a way that the diffractive images are only visible in reflected light, whereas the gaps are only visible in transmitted light. Specifically, Schmitz discloses that the optically variable effects (*i.e.*, diffractive images) are visible only in reflected light. See Schmitz col. 5, lns. 26-27; col. 6, lns. 25-27, 62-65; col. 7, lns. 22-25. While the gaps (and any information encoded therein) are visible only when viewed using transmitted light. See Schmitz col. 5, lns. 22-24; col. 5, lns. 25-27, 62-65; col. 7, lns. 22-25. Thus, if the gaps were to become visible under the “on-axis” viewing condition (*i.e.*, the reflected light viewing condition under which the diffractive image is reconstructed) the gaps would be visible in reflected light. This goes expressly against the teachings of Schmitz, which specifies that the gaps “virtually do not appear” when viewed in reflected light. For at least this reason, one of ordinary skill in the art would not have combined the teachings of Schmitz and Menz, because the suggested combination would render the security element of Schmitz unsatisfactory for its intended purpose and impermissibly change its function. Thus, the combination of Schmitz and Menz is the result of improper hindsight.

Moreover, even if the combination were not pure hindsight, which it is, one of ordinary skill in the art would not understand how to modify the gaps of Schmitz such that they correspond to the blackened regions or partially destroyed hologram regions of Menz. That is, the gaps of Schmitz do not have the same properties as the blackened regions or partially destroyed hologram regions of Menz. Therefore, one of ordinary skill in the art would either choose to provide the blackened or partially destroyed regions instead of the gaps or to provide blackened or partially destroyed regions in addition to the gaps, *i.e.*, provide two different kinds of subareas. In either case, the gaps would still only be visible in transmitted light. Thus, the combination of Menz and Schmitz would yield a security element would not come any closer to

the present invention than a security element produced according to the teachings of either Menz or Schmitz alone. For at least this additional reason the combination of Menz and Schmitz is improper.

For the above discussed reasons, Applicants respectfully request that the rejection of claim 1 be withdrawn. Additionally, Applicants respectfully request that the rejection of claims 2-5 and 59 likewise be withdrawn because these claims depend from claim 1.¹

Claim 9

With regard to claim 9, the Office Action admits that Schmitz fails to teach or suggest that “the recognizable information represented by the subareas is recognizable under certain viewing conditions differing from the specific viewing conditions of the diffractive image,” See Office Action at page 8. This statement corresponds to the claim limitation: “the recognizable information represented by the subareas is recognizable under viewing conditions differing from the specific viewing conditions, under which the diffraction structure reconstructs the diffractive image,” as recited in claim 9. The Office Action submits that this limitation is disclosed in Menz, as described in detail above.

While the Office Action alleges that Menz discloses the above recited limitation, Applicants cannot find a disclosure in Menz which teaches or suggests that the recognizable information represented by the subareas is recognizable under viewing conditions differing from the specific viewing conditions. However, Menz does affirmatively teach: “[t]he sub-regions, which do not take part in the image reconstruction from the respective direction of gaze, can be arranged such that when the holographically reconstructed structure is observed, a pattern of these regions not taking part in the holographic reconstruction results which supplies recognisable information.” See Menz col. 3, lns. 1-6 (emphasis added). That is, Menz discloses the sub-regions being recognizable only under the same viewing conditions that permit the reconstruction of the holographic image. By contrast, claim 9 requires that the sub-areas be recognizable only under different viewing conditions than those that permit reconstruction of the

¹ Claims 3-4 have been amended to depend from claim 1. Claim 5 depends from claim 4, and claim 59 depends from claim 5.

diffractive image. Thus, Menz fails to cure the admitted defect of Schmitz. For at least this reason claim 9 is allowable over the combination of Schmitz and Menz.

Additionally, the Office Action asserts that “the on-axis/off-axis design of Menz et al. could be incorporated into the design of Schmitz et al. such that the diffraction structure reconstructs a diffractive image under on-axis transmitted light, but that the viewing conditions under which the diffraction structure does not represent a diffractive image (i.e. when the information of the subarea is viewable) can be under off-axis transmitted light.” See Office Action at page 8 (emphasis added). Thus, according to the Office Action, both the diffractive image and the subareas are both visible, albeit when viewed from different axes, under transmitted light. As discussed, in detail, above, the security element of Schmitz is designed in such a way that the diffractive images are only visible in reflected light, whereas the gaps are only visible in transmitted light. Thus, the asserted combination, which would allow for the diffractive image of Schmitz to be visible in transmitted light, is the result of impermissible hindsight.

Moreover, even if the combination were not pure hindsight, which it is, one of ordinary skill in the art would not understand how to modify the gaps of Schmitz such that they correspond to the blackened regions or partially destroyed hologram regions of Menz. That is, the gaps of Schmitz do not have the same properties as the blackened regions or partially destroyed hologram regions of Menz. Therefore, one of ordinary skill in the art would either choose to provide the blackened or partially destroyed regions instead of the gaps or to provide blackened or partially destroyed regions in addition to the gaps, i.e., provide two different kinds of subareas. In either case, the gaps would still only be visible in transmitted light. Thus, the combination of Menz and Schmitz would yield a security element would not come any closer to the present invention than a security element produced according to the teachings of either Menz or Schmitz alone. For at least this additional reason the combination of Menz and Schmitz is improper.

For the above discussed reasons, Applicants respectfully request that the rejection of claim 9 be withdrawn. Additionally, Applicants respectfully request that the rejection of claims 10-12 and 62-63 likewise be withdrawn because these claims depend from claim 9.

Claim 39

The Office Action's rejection of claim 39 is improper for all of the reasons discussed above with regard to claim 1. For all of the afore mentioned reasons, Applicants respectfully request that the rejection of claim 39 be withdrawn.

Additionally, the Office Action asserts that a production of the gaps of Schmitz during the embossing of diffraction structures is disclosed or suggested by col. 6, line 6 to col. 7, line 9 and col. 8, lines 7 to 44, because the "embossed layer can be formed separately or directly onto the surface of the carrier." However, this line of reasoning is illogical and incorrect.

The gaps of Schmitz pass through the magnetic layer and, therefore, cannot be embossed into this layer, but merely can be produced by removing parts of the magnetic layer, e.g., by etching. Embossing is a process of printing during which a raised pattern is created. <http://www.baph.org.uk/general%20reference/glossary%20of%20papermaking%20terms.htm>. No gap is produced during an embossing process. For at least this additional reason, the combination of Schmitz and Menz fails to teach or suggest each and every limitation of the claimed invention. For this separate and additional reason, Applicants respectfully request that the rejection of claim 39 be withdrawn.

Claim 48

The Office Action's rejection of claim 48 is improper for all of the reasons discussed above with regard to claim 9. For all of the afore mentioned reasons, Applicants respectfully request that the rejection of claim 48 be withdrawn.

Additionally, the Office Action asserts that a production of the gaps of Schmitz during the embossing of diffraction structures is disclosed or suggested by col. 6, line 6 to col. 7, line 9 and col. 8, lines 7 to 44, because the "embossed layer can be formed separately or directly onto the surface of the carrier." However, this line of reasoning is illogical and incorrect.

The gaps of Schmitz pass through the magnetic layer and, therefore, cannot be embossed into this layer, but merely can be produced by removing parts of the magnetic layer, e.g., by etching. Embossing is a process of printing during which a raised pattern is created. <http://www.baph.org.uk/general%20reference/glossary%20of%20papermaking%20terms.htm>. No gap is produced during an embossing process. For at least this additional reason, the

combination of Schmitz and Menz fails to teach or suggest each and every limitation of the claimed invention. For this separate and additional reason, Applicants respectfully request that the rejection of claim 48 be withdrawn.

The Office Action has rejected claims 3-5, 10-11, 59, 62, and 63 under 35 U.S.C. § 103 as allegedly unpatentable over Schmitz in view of Menz, and in further view of U.S. Patent Publication No. 2004/0101676 to Phillips et al. ("Phillips"). Applicants disagree with the Office Action/s assertions and traverse the rejection.

Phillips is generally directed to optically variable security devices. More specifically, Phillips is directed to a color shifting optical coating that can be used to form security articles. See Phillips Abstract. This color shifting optical coating can be applied over an embossed diffraction structure. See Phillips Para. [0023].

Phillips fails to cure the above discussed defects of Schmitz and Menz. Thus, for at least the reasons discussed above, claims 3-5 and 59 (which depend from claim 1), and 10-11 and 62-63 (which depend from claim 9) are allowable over the cited prior art. Applicants respectfully request that the rejection be withdrawn.

CONCLUSION

In view of the above, all objections and rejections have been sufficiently addressed. The Applicants submit that the application is now in condition for allowance and request that claims 1-5, 9-12, 39, 48, 59, and 62-63 be allowed and this application passed to issue.

In the event that this paper is not timely filed, the Applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account No. 02-2135.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the Applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

Respectfully submitted,

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